

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
FLINT DIVISION**

BEVERLY BIGGS-LEAVY, an individual,  Plaintiff,  vs.  LADEL LEWIS, in her official and individual capacities,  Defendants.	Hon. Sean F. Cox Magistrate Judge Kimberly G. Altman  Civil Action No.: 2:23-cv-12123-SFC- KGA
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**PLAINTIFF'S RESPONSE TO THE COURT'S ORDER TO SHOW CAUSE**

Plaintiff's counsel, Joseph Cannizzo Jr., Esq., Lawrence A. Katz, Esq., and John A. Fernandez, Esq. of the law firm Lento Law Group, P.C., hereby provide this Response to the Court's Order to Show Cause of December 18, 2023, wherein the Court orders Plaintiff to show cause as to why the unopposed Motion to Dismiss filed by Defendant, LADEL LEWIS, should not be granted.

1. In support of Plaintiff's response, Plaintiff incorporates by reference herein the Certifications of Joseph Cannizzo Jr., Esq., Lawrence A. Katz, Esq., and John A. Fernandez, Esq., filed concurrently herewith.
2. Given the explanation provided in the aforementioned Certifications of Plaintiff's Counsel, it is our belief that good cause has been shown as to why the Defendant's subject Motion to Dismiss should not be granted.

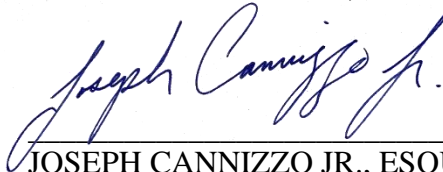
3. As a result of the unfortunate mistake on attorney Cannizzo's part and as a further result of the technological difficulties experienced by attorney Katz and attorney Fernandez, we respectfully request that this Honorable Court find that good cause exists as to why the Defendant's subject Motion to Dismiss should not be granted, and that Plaintiff have another opportunity, consistent with Your Honor's Order of November 15, 2023, to file an Amended Complaint to cure the purported deficiencies in Plaintiff's operative Complaint

4. We hope this matter has been addressed to the Court's satisfaction, and we apologize for any inconvenience.

WHEREFORE, given the foregoing, good cause exists as to why the Court should not impose sanctions or dismiss the instant action.

Respectfully Submitted,

**LENTO LAW GROUP, P.C.**



Dated: December 26, 2023

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**LENTO LAW GROUP, P.C.**



Dated: December 26, 2023

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Dated: December 26, 2023

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**CERTIFICATION OF SERVICE**


I hereby certify that on this, the 26<sup>th</sup> day of December, 2023, a true and correct copy of the foregoing document was electronically filed with the Clerk of Court using the District's CM/ECF system, which will send notification to all parties of record, including:

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LENTO LAW GROUP, P.C.

DATED: December 26, 2023

  
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